UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

JANE DOE NO. 1, JANE DOE NO. 2, and)))
JANE DOE NO. 3,	
Plaintiffs,))
v.)	Docket No. 1:17-cv-11069-LTS
BACKPAGE.COM, LLC, CARL FERRER, MICHAEL LACEY, and JAMES LARKIN,	
Defendants.	
))

MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL

Plaintiffs Jane Doe No. 1, Jane Doe No. 2, and Jane Doe No. 3 ("Plaintiffs") hereby request leave to file four (4) exhibits to Plaintiffs' First Amended Complaint (exhibits marked as C, D, R, and U; together, the "Exhibits") under seal. In support of this Motion, Plaintiffs state as follows:

- 1. Defendants Backpage.com, LLC, Carl Ferrer, Michael Lacey, and James Larkin ("Defendants") and Plaintiffs (together, the "Parties") jointly moved this court to enter a Protective Order in the above-captioned matter (ECF No. 50), which this court granted on February 26, 2018 (ECF No. 51, 52).
- 2. The Protective Order establishes a procedure to designate certain materials as "Confidential" or as "Highly Confidential." ECF No. 52 at 2, 3. Per the Protective Order, documents so designated cannot be disclosed to, *inter alia*, the general public. *Id.* at 6-7.
- 3. Pursuant to this procedure, the Parties during limited discovery produced certain documents designated as "Confidential" and certain documents designated as "Highly Confidential."

4. Exhibits C and D are discovery responses exchanged between the Parties, which are designated as "Confidential." Exhibits R and U are documents produced by the Parties during discovery, which are designated either as "Confidential" or as "Highly Confidential."

WHEREFORE, Plaintiffs respectfully request leave to file the Exhibits under seal. Plaintiffs will promptly provide complete copies of the Exhibits to Defendants through an encrypted electronic file transfer to allow Defendants to review.

> JANE DOE NO. 1, JANE DOE NO. 2, and JANE DOE NO. 3

Respectfully submitted,

/s/ John T. Montgomery

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Dated: April 11, 2018

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

JANE DOE NO. 1, JANE DOE NO. 2, and JANE DOE NO. 3,)))
Plaintiffs,	
v.	Docket No. 1:17-cv-11069-LTS
BACKPAGE.COM, LLC, CARL FERRER, MICHAEL LACEY, and JAMES LARKIN,	
Defendants.	
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[PROPOS	ED] <u>ORDER</u>
Upon application of Plaintiffs Jane Doe	No. 1, Jane Doe No. 2, and Jane Doe No. 3
("Plaintiffs"), and for good cause shown,	
IT IS HEREBY ORDERED this day of, 2018, that Plaintiffs may file the	
exhibits marked as C, D, R, and U (the "Exhibi	ts") to Plaintiffs' First Amended Complaint in the
above-captioned matter under seal.	
IT IS FURTHER ORDERED that Pla	intiffs will promptly provide Defendants
complete copies of the Exhibits within three (3)) days of this Order.
IT IS SO ORDERED.	
Dated:	
	HON. LEO T. SOROKIN
	U,S, DISTRICT JUDGE
	DISTRICT OF MASSACHUSETTS

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of April, 2018, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ John T. Montgomery

Dated: April 11, 2018 John T. Montgomery